



# Privacy Policy

Protecting your personal information is important to FIDERE. In addition to the practices described below, FIDERE uses a variety of physical, technical and administrative security measures that help to safeguard your information. For Social Security Numbers (SSN), this includes restricting access to our employees or others who use your SSN only as permitted by law, such as to comply with the law, to provide you with services and/or products in the course of your relationship with FIDERE. Our privacy practices continue to apply to your information even if you cease to be a FIDERE client.

## Written Information Security Program (WISP)

Your personally identifiable information (PII) is managed in the following manner: 1) our offices and this building remain secure each night; 2) assets values, quantities, and insurance policies and other detailed account and/or relationship information is handled through our office will only be discussed with titled owners, unless a Power of Attorney (POA), Letters of Testamentary Personal Representative (PR or Executor) or court subpoena documentation is supplied by third parties and can be validated; 3) we password protect and encrypt any equipment and/or electronic documentation that contains PII, and provide access only to titled owner(s) or authorized parties as described in item 2 herein.

## FIDERE Privacy Assurance Program (BPAP)

- FIDERE does not give or sell your personal or medical information to anyone.
- FIDERE does not share your information with non-affiliate companies that would use it to contact you about their own services and/or products.
- FIDERE requires persons or organizations that represent or assist FIDERE in servicing your relationship to keep your information confidential.
- FIDERE requires our employees to protect your personal information and keep it confidential.

## The Internet and Your Information Security

Our website, [www.fidereadvice.com](http://www.fidereadvice.com), provides information about FIDERE (or "The Company") and the services and/or product offerings available through FIDERE. You may also perform some transactions on the web site. This Privacy Statement applies to users of [www.fidereadvice.com](http://www.fidereadvice.com), regardless of whether the user is a FIDERE client.

FIDERE uses cookies, analytics and other technology to help FIDERE provide users with a better service and a more customized user experience. Additionally, our business partners use tracking services, analytics and other technologies to monitor visits to [www.fidereadvice.com](http://www.fidereadvice.com). The website may also use web beacons (also called "clear GIFs" or "pixel tags") in conjunction with cookies. If you prefer, you can choose to not accept cookies by changing the settings on your web browser. Many commercial internet sites use cookies; a cookie enables the site to label you as a particular user, but it does not identify you by name or address unless you have provided FIDERE with such information (over the internet or otherwise) or set up preferences in your browser to do so automatically.

Cookies allow FIDERE to provide you with a more customized service and are used to track and measure web site usage. This information may be used to manage and customize our web site's content, layout, and services in order to improve our site, enhance client service, and provide tailored messages.

You may opt out of accepting cookies by changing the settings on your browser. However, rejecting cookies may prevent you from using certain functions and you may have to repeatedly enter information to take advantage of services and/or products.

FIDERE may also use client information to send you informational communications about current events or developments in the financial marketplace and/or economic landscape, which FIDERE believes may be of interest to you. Further, FIDERE may use client information to send you marketing communications about services and/or product offerings that may be suitable for your consideration. If FIDERE has your e-mail address, FIDERE may do this by e-mail. If you do not wish to receive promotional e-mails from FIDERE, please contact FIDERE at the following address: [team@fidereadv.com](mailto:team@fidereadv.com) (attn: Privacy).

## Frequently Asked Questions About Privacy

### *How does FIDERE use and share my personal information?*

In the course of normal business activities, FIDERE uses and shares your personal information. FIDERE may provide your information to persons or organizations within and outside of FIDERE. This would be done as required or permitted by law. For example, FIDERE may do this to:

- Fulfill a transaction you requested or service your account.
- Market our service and/or product offerings.
- Service your relationship.
- Prevent fraud.
- Comply with requests from regulatory and law enforcement authorities.

The persons or organizations with which FIDERE may share your personal information may include, among others:

- Your advisor, broker or FIDERE-affiliated companies, for the sole purpose of conducting business in a legal and ethical manner.
- Companies that perform services, such as marketing and communication services on our behalf.
- Business partners that assist FIDERE with tracking how visitors use [www.fidereadvice.com](http://www.fidereadvice.com)
- Other financial companies that play a role in any transaction with you.
- A business or businesses that conduct research or project work in the course of your relationship with FIDERE.
- Those who request information pursuant to a subpoena or court order.
- Other vendors involved in the necessary daily activities of FIDERE business according to the BPAP.

### *How do I review and correct personal information?*

You can request to review your personal information contained in our records at any time. To do this, please send a letter to the address below requesting to see your information for the previous two years. If you believe that our information is incomplete or inaccurate, you can request that FIDERE correct it. Please note FIDERE may not be able to provide information relating to legal matters. FIDERE will be happy to make corrections whenever possible. Please send requests to:

[team@fidereadv.com](mailto:team@fidereadv.com)

### *Does FIDERE share of your personal information?*

FIDERE will not share your personal information with a third party, except under the circumstances described in the the circumstances described in the Written Information Security Program above.

### *Who should use the FIDERE website?*

The FIDERE website is for financial services and products and is not intended for children; FIDERE does not market any products or services to children under



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the age of nineteen or knowingly collect any information from children under the age of nineteen. If FIDERE becomes aware that information is or has been submitted by or collected from a child under the age of nineteen, FIDERE will delete this information.

## *What security procedures does FIDERE use to protect your PII and financial information?*

To help ensure the security of your PII and financial information that you submit to this site, (other than via an e-mail message), FIDERE uses security software to encrypt the information before and during its transmission through the Internet. FIDERE only allows information to be submitted for transmission if your browser is compatible with our security software. If your browser is not compatible, you will receive a message indicating your transaction can be completed but at a lower level of security. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, FIDERE cannot guarantee its absolute security.

E-mail messages are not secure. Our security software does not encrypt e-mail messages. E-mail messages traveling through the Internet are subject to viewing, alteration, and copying by potentially anyone on the Internet.

You should exercise discretion with respect to the submission of any personal or financial information via e-mail. If you are concerned about the security of your communication, FIDERE encourages you to send your correspondence through the postal service or use the telephone to speak directly to FIDERE. FIDERE is not responsible for the security or confidentiality of communications you send to FIDERE through the Internet using e-mail messages.

## *How can clients help maintain the security of information when accessing FIDERE online?*

Some steps you can take to maintain the security of your information include:

- Utilize the latest, updated version of your web browser.
- Keep your username and password confidential. Utilize a password unique to you and change it regularly.
- Make sure others are not watching you enter your username or password on your keyboard when using the Client Login area or when using other protected areas of [www.fidereadvice.com](http://www.fidereadvice.com)
- Do not leave your computer unattended while logged onto our Client Login area or other protected areas of [www.fidereadvice.com](http://www.fidereadvice.com). After you've finished accessing your information, exit the Client Login area or other protected area within [www.fidereadvice.com](http://www.fidereadvice.com), and close your browser window.

## *Whose privacy statement applies to links and co-branded sites?*

FIDERE provides links to other sites as a convenience to persons who visit the FIDERE website. If you choose to use the services provided by those sites, you may be asked by those sites to provide certain Personally Identifiable Information (PII), some of which may be shared with FIDERE. Please be aware that FIDERE is not responsible for the privacy practices of those sites. FIDERE encourage you to be aware when you leave our site and to read the privacy policies of every website that you visit, as the privacy policies of those sites may differ from ours. Our Privacy Statement applies solely to this website.

## *What Personally Identifiable Information (PII) does FIDERE retain?*

FIDERE gathers personally identifiable information (PII) only from you. Some examples of the information FIDERE collects from you may include your name, phone number, home and e-mail addresses, driver's license number, social security number, marital status, family member information and healthcare information. Also, FIDERE maintains records that include, but are not limited to, account numbers, quantities and values, and transaction history.

Also, our business partners assist FIDERE with monitoring information including, but not limited to, IP addresses, domain names and browser data, which can help FIDERE to better understand how visitors use [www.fidereadvice.com](http://www.fidereadvice.com).

## **FIDERE Contact Information & Opt-Out**

FIDERE is committed to serving you when and where you prefer as FIDERE helps you manage risk and plan for the future. To that end, and as Minnesota law requires, if you do not want to receive calls from FIDERE, you have the option to be placed on our internal "do not call" list. (Please disregard this notice if you have already been added to FIDERE's internal "do not call" list.) You may make this request in the following convenient ways:

- Call 1-833-234-3373 and speak with a representative
- Visit [www.fidereadvice.com](http://www.fidereadvice.com), click on Contact and send FIDERE an e-mail

In your discussion or correspondence with FIDERE, please be sure to provide FIDERE with your name, address and all telephone numbers you wish to include on our list. Please note that FIDERE's "do not call" list is limited only to telephone calls. FIDERE may still contact you about your FIDERE account, billing issues, claims and other service matters.

To opt-out from FIDERE's Privacy Policy, please contact us at [team@fidereadv.com](mailto:team@fidereadv.com) or (833) 234-3373. If sending an email, please include your name and contact information, and include "opt-out" in the subject line of your message.

If you have questions about this Privacy Policy, you may contact FIDERE, or you may contact the Minnesota Attorney General's office at:

Office of the Minnesota Attorney General Bureau of Consumer Protection

1400 Bremer Tower

445 Minnesota Street St. Paul, MN 55101

Phone: (651) 296-3353

Email: [Attorney.General@ag.state.mn.us](mailto:Attorney.General@ag.state.mn.us)

## **Other Information**

FIDERE understands your concerns about privacy and confidentiality and hope this notice has been helpful to you. FIDERE values its relationship with you and look forward to serving you over the long-term. FIDERE reserves the right to change its Privacy practices, procedures, and terms. Please be aware that FIDERE may periodically update or revise this Privacy Statement. If FIDERE makes a material changes to this online Privacy Statement, FIDERE will post the updated Statement on [www.fidereadvice.com](http://www.fidereadvice.com) within 72 business hours.

If users have questions or concerns regarding this statement, they should first contact FIDERE at [team@fidereadv.com](mailto:team@fidereadv.com) (attn: Privacy). If you are not comfortable with any of the terms or policies described in this Privacy Statement, FIDERE asks that you discontinue use of its website. If you have questions or would like more information, please don't hesitate to contact the FIDERE Information Center at 1-833-234-3373 or [team@fidereadv.com](mailto:team@fidereadv.com)

Though not required by legal or regulatory compliance requirements, FIDERE operates under a HIPAA standard. For details about HIPAA protocols, please visit [www.fidereadvice.com](http://www.fidereadvice.com).